

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ROBERT N. HARRINGTON, JR.)	CASE NUMBER 05-40115 FDS
Plaintiff,)	
)	
VS.)	
)	
JAMES M KREIDLER, JR. AND)	
THE TOWN OF WINCHENDON,)	
Defendants.)	

INDEX OF TRIAL EXHIBITS

Plaintiff's Exhibits:

1. Employment Agreement – Town of Winchendon & Robert N. Harrington, Jr.
2. Letter of Disciplinary Action from James Kreidler to Robert N. Harrington, Jr. dated May 29, 2001
3. January 6, 2001 Winchendon Police Department News Release
4. Memorandum dated October 25, 2001 from Robert N. Harrington, Jr. to Jim Kreidler regarding National Guard dates
5. Letter dated January 7, 2002, from Robert N. Harrington, Jr. to James Kreidler re possibility of being activated for homeland defense
6. Letter of written reprimand from James Kreidler to Robert N. Harrington dated January 10, 2002
7. Memorandum dated January 14, 2002 from Robert N. Harrington, Jr. to James Kreidler regarding cancelled vacation time
8. Memorandum dated January 16, 2002 from Robert N. Harrington, Jr. to James Kreidler regarding Military Activation
9. Memorandum dated January 17, 2002 from Robert N. Harrington, Jr. to James Kreidler regarding military duty for 1/22/02
10. Memorandum dated January 17, 2002 from Robert N. Harrington, Jr. to James Kreidler regarding military duty
11. Memorandum dated January 18, 2002 from Robert N. Harrington, Jr. to James Kreidler regarding military deployment
12. Memorandum dated January 23, 2002 from Robert N. Harrington, Jr. to James Kreidler regarding use of benefit time while on military duty

13. Letter of verbal warning from James Kreidler to Robert N. Harrington, Jr. dated January 22, 2002
14. Letter of Suspension from James Kreidler to Robert N. Harrington, Jr. dated January 24, 2002
15. Letter dated January 23, 2002 from James Kreidler to Robert N. Harrington, Jr. in response to January 23, 2003 memorandum regarding benefit time while on military duty
16. Letter dated January 23, 2002 from James Kreidler to Robert N. Harrington, Jr. regarding vacation sell-back
17. March 4, 2002 Memo from James Kreidler to Robert N. Harrington, Jr.
18. Memorandum from Robert N. Harrington, Jr. to James Kreidler regarding military duty
19. Letter of Suspension dated March 11, 2002 from James Kreidler to Robert N. Harrington
20. Revised suspension letter dated March 11, 2002
21. Military Orders dated January 30, 2002
22. Memorandum dated April 4, 2002 from James Kreidler to Robert N. Harrington, Jr. re firearm's upgrade
23. Letter dated April 3, 2002 from James Kreidler to Robert N. Harrington, Jr. re communication
24. Letter dated April 30, 2002 from James Kreidler to Robert N. Harrington, Jr. re Orders
25. Letter dated April 30, 2002 from James Kreidler to Robert N. Harrington, Jr. re Orders
26. Letter dated April 30, 2002 from Robert N. Harrington, Jr. to James Kreidler re Chief of Police Conference
27. Memorandum dated May 7, 2002 from James Kreidler to Robert N. Harrington, Jr. re Compensatory Time
28. Memorandum from Robert N. Harrington, Jr. to James Kreidler re Performance Evaluation Review
29. May 12, 2002 News Release
30. Letter dated May 13, 2002 from James Kreidler to Robert N. Harrington regarding 5/12/02 News Release
31. Memorandum dated May 16, 2002 from Robert N. Harrington, Jr. to James Kreidler regarding Response to Press Release
32. Letter dated June 4, 2002 from James Kreidler to Robert N. Harrington, Jr. regarding memo relating to Chief's meeting

33. Letter dated June 5, 2002 from James Kreidler to Robert N. Harrington, Jr. regarding 5/16/02 memo re political pressure
34. Letter dated June 6, 2002 from James Kreidler to Robert N. Harrington, Jr. regarding Notice of Non-Renewal of Employment Agreement
35. Letter dated July 11, 2002 from Robert N. Harrington, Jr. to James Kreidler re response to 6/5/02 political pressure memo
36. Letter dated May 27, 2003 from James Kreidler to Robert N. Harrington re Discharge
37. Robert N. Harrington, Jr. NCO Evaluation Report

Defendant's Exhibits:

55. Disciplinary action dated March 11, 1998 regarding sleeping in cruiser;
56. Discharge letter dated May 27, 2003;
57. Administrative leave letter dated July 19, 2002;
58. Worcester Telegram article dated July 23, 2002;
59. Notice of termination and hearing dated December 19, 2002;
60. Letter from Corey Bohan dated May 1, 2002 regarding allegations against Harrington;
61. Letter from James Kriedler dated June 4, 2002 regarding request for response to Bohan's allegations;
62. Letter from Robert Harrington dated July 11, 2002 in response to Bohan's allegations;
63. Dispatcher's Union Labor Charge and attached exhibits;
64. Harrington's performance evaluation dated February 21, 2002;
65. Disturbance call dated May 28, 2002;
66. Police report dated May 28, 2002;
67. License revocation notice for Corey Bohan;
68. Kriedler's response to allegations of threats to Harrington dated June 11, 2002;
69. Karen Ludington's investigation report dated December 13, 2002;

70. Memo from Harrington dated May 17, 2002 regarding complaint by Harold Mason for cruiser for Memorial Day Parade;
71. Richard McAllister's investigation regarding Memorial Day Parade and Harrington's allegations;
72. Letter from Kriedler dated June 4, 2002 requesting response from Harrington regarding McAllister's investigation;
73. Harrington's response dated June 10, 2002;
74. Affidavit of Harold Mason;
75. Dispatcher's vote of no confidence;
76. Letter of 5 day suspension dated May 11, 2002;
77. Revised letter of 5 day suspension dated May 11, 2002;
78. Letter from Department of Labor dated March 26, 2002 regarding suspension;
79. Final letter of 4 day suspension dated July 23, 2002;
80. Letter of 1 day suspension dated January 24, 2002;
81. Quinn Bill payments for FY 2002;
82. Letter of discipline dated May 29, 2001 regarding 5 day suspension related to police shooting;
83. Harrington's request for hearing on discipline dated June 4, 2001;
84. Kriedler's response to request for hearing dated June 4, 2001;
85. Revised letter of discipline dated June 4, 2001;
86. Harrington's withdrawal of appeal of suspension dated June 11, 2001;
87. Press release regarding discipline;
88. Press release dated January 6, 2001 regarding shooting;
89. Revised press release regarding retraction of January 6, 2001 release;
90. Letter from Harrington dated February 5, 2003 regarding objection to discipline related to shooting;

91. Written warning dated October 4, 2001.

Respectfully submitted,
Defendants, James M Kreidler, Jr. and
Town of Winchendon,
By their attorneys,

/s/ Kristin Tyler Harris

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Dated: June 10, 2008